Wendy H. Schwartz (WS-1862) **REED SMITH LLP**599 Lexington Avenue
New York, New York 10022
Tel. (212) 521-5400
Fax (212) 521-5450
Attorneys for Defendants
Glingrow Holding Ltd. and Rias Trading.

UNITED STATES DISTRICT COURT	
SOUTHERN DISTRICT OF NEW YORK	
·	V
	: :
PAGANE MARITIME LTD.	: <u>ECF Case</u>
	:
Plaintiff,	: 07 Civ. 10726 (PKL)
	:
v.	:
CLINCROW HOLDING LTD and	:
GLINGROW HOLDING LTD. and	•
RIAS TRADING,	:
<b>- a a</b>	<b>:</b>
Defendants.	:
	:
	X

## **NOTICE OF MOTION**

PLEASE TAKE NOTICE, that, pursuant to Fed. R. Civ. P. Rules 12(b)(1) and 12(b)(6) and Rule 6.3 of the Local Rules of this Court, and upon the declaration of Wendy H. Schwartz, executed February 14, 2008, and all exhibits annexed thereto, and the accompanying Memorandum of Law, and all prior pleadings herein, Rias Trading will move this Court, before the Honorable Peter K. Leisure, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York New York 10007, on a date and time to be determined by the Court, for an Order granting Defendants' Motion to Dismiss

the Complaint and Reconsider Vacating the Maritime Attachment, along with such other and further relief as the Court deems just and proper.

Pursuant to Local Civil Rule 6.1, any opposing affidavits and answering memoranda are to be served within ten business days after service of these papers, and any reply affidavits and memoranda of law are to be served within five business days after service of the answering papers.

Dated:

New York, New York February 14, 2008

## REED SMITH LLP

By: /s/ Wendy H. Schwartz
Wendy H. Schwartz (WS-1862)
599 Lexington Avenue
New York, New York 10022
Tel. (212) 521-5400
Fax. (212) 521-5450
Attorneys for Defendants